

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:

BRANDON CALLIER,

Plaintiff,

V.

**PAC WESTERN FINANCIAL LLC and,
JASCOTT ENTERPRISES, LLC,**

Defendants.

CAUSE NO. EP-22-CV-0301

**DEFENDANT JASCOTT ENTERPRISES, LLC’S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S
COMPLAINT**

TO THE HONORABLE U.S. DISTRICT JUDGE FRANK MONTALVO:

COMES NOW Defendant JASCOTT ENTERPRISES, LLC (hereinafter referred to as “JASCOTT” and/or “Defendant”), by and through the undersigned counsel, and hereby file this “Defendant Jascott Enterprises, LLC’s Unopposed Motion For Extension Of Time To Respond To Plaintiff’s Complaint” (“Unopposed Motion”), and would respectfully show this Court as follows:

I. FACTUAL AND PROCEDURAL BACKGROUND.

1. Defendant JASCOTT was served with Plaintiff Brandon Callier's Complaint on September 19, 2022, making Defendant's answer and/or response due on October 10, 2022.

2. Defendant JASCOTT retained the undersigned counsel on September 20, 2022, and requires additional time to gather and review documents and information pertaining to subject case in order to prepare an answer and/or response.

3. Therefore, Defendant JASCOTT respectfully requests that its deadline to file a response to Plaintiff's Complaint be extended to October 19, 2022.

4. Defendant JASCOTT does not make this request for purposes of delay, but only so that justice may be done.

5. The undersigned counsel conferred with both Plaintiff Brandon Callier and Counsel for PAC Western Financial LLC, Ashley R. Presson, and both Plaintiff Callier and Ms. Presson are unopposed to this Motion. (See Attached Exhibits A and B).

II. PRAYER.

WHEREFORE, ALL PREMISES CONSIDERED, and for the foregoing reasons, Defendant Jascott Enterprises, LLC prays the Court (a) grant this unopposed Motion, (b) grant said Defendant an extension of time to respond to Plaintiff's Complaint until Wednesday, October 19, 2022, and (c) for such other and further relief to which said Defendant may show itself justly entitled.

October 5, 2022

Respectfully submitted,

THE NEVAREZ LAW FIRM, PC
Attorneys and Counselors At Law
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/s/ Michael R. Nevarez
MICHAEL R. NEVAREZ
State Bar No. 14933400

Attorney for Defendant
Jascott Enterprises, LLC

CERTIFICATE OF CONFERENCE

I hereby certify, in accordance with Local Rule CV-7(g), that, on September 30, 2022, the undersigned conferred via email with Plaintiff Brandon Callier, in a good-faith attempt to resolve subject matter by agreement, as to whether or not Mr. Callier would oppose the foregoing **DEFENDANT JASCOTT ENTERPRISES, LLC'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**, and Mr. Brandon Callier:

☒ DID NOT oppose the foregoing document;
☐ DID oppose the foregoing document;
☐ DID NOT respond.

/s/ Michael R. Nevarez
MICHAEL R. NEVAREZ

CERTIFICATE OF CONFERENCE

I hereby certify, in accordance with Local Rule CV-7(g), that, on September 30, 2022, the undersigned conferred via email with Ms. Ashley R. Presson, Counsel for PAC Western Financial LLC, in a good-faith attempt to resolve subject matter by agreement, as to whether or not they would oppose the foregoing **DEFENDANT JASCOTT ENTERPRISES, LLC'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**, and Ms. Presson:

☒ DID NOT oppose the foregoing document;
☐ DID oppose the foregoing document;
☐ DID NOT respond.

/s/ Michael R. Nevarez
MICHAEL R. NEVAREZ

CERTIFICATE OF SERVICE

I hereby certify, in accordance with the Federal Rules of Civil Procedure that a true and correct copy of the foregoing **DEFENDANT JASCOTT ENTERPRISES, LLC'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**, with all supporting attachments, exhibits, and affidavits referenced therein, if any, was served either by eFiling via an Electronic Filing Service Provider, and/or via facsimile, to the following parties in interest, on this October 5, 2022:

PLAINTIFF:

Brandon Callier
6336 Franklin Trail
El Paso, TX 79912
Email: Callier74@gmail.com

COUNSEL FOR PAC WESTERN FINANCIAL LLC:

Ashley R. Presson
GORDON REES SCULLY MANSUKHANI
2705 Bee Caves Road, Ste. 220
Austin, TX 78746
Email: apresson@grsm.com

/s/ Michael R. Nevarez _____

MICHAEL R. NEVAREZ